



February 28, 2022

Ms. Jocelyn Boyd
Chief Clerk and Administrator
Public Service Commission of SC
101 Executive Center Dr., Suite 100
Columbia, SC 29210

RE: JACABB Utilities, LLC Docket No. 2019-387-A – Order No. 2022-141

Dear Ms. Boyd:

Enclosed is JACABB Utilities, LLC Customer Data Privacy Policy per Order No. 2022-141 to Docket No. 2019-387-A.

If you need additional information, please call (864)882-8194.

Sincerely,

JACABB UTILITIES

A handwritten signature in blue ink, appearing to read 'S. Goldie', is written over the printed name of Stephen R. Goldie.

Stephen R. Goldie
Managing Owner

cc: Office of Regulatory Staff



JACABB Utilities, LLC
Customer Data Privacy Policy

Effective Date: January 20, 2022

Definitions of Key Terms

- **Aggregated Data** – The term “aggregated data” means customer data, alone or in combination with non-customer data, resulting from processing (e.g., average of a group of customers) or the compilation of customer data from which all unique identifiers have been removed.
- **Commission** - The term “Commission” means the Public Service Commission of South Carolina
- **Customer Data** – For purposes of this section, “customer data” means data about a current or former customer’s water or wastewater usage; information that is obtained as a part of an advanced metering infrastructure; and personal identifying information, as defined in S.C. Code Ann. Section 39-1-90(D)(3) and S.C. Code Ann. Section 16-13-510(D), as may be amended, including the name, account number, billing history, address of the customer, email address, telephone number, and fax number, in the possession on electric, natural gas, water or wastewater public utilities. Also, “customer data” means non-public retail customer-specific data or information that has been obtained or compiled by JACABB Utilities, LLC in connection with the supplying of Commission-regulated water or wastewater services. Customer data includes data or information that is: (a) collected from the meter, by JACABB Utilities, LLC, and stored in its data systems for billing purposes; (b) customer-specific usage information for regulated public utility service; (c) about the customer’s participation in regulated public utility programs, such as renewable energy, demand-side management, load management, or energy efficiency programs; or (d) any other non-public information specific to a customer that is related to electricity consumption, load profile or billing history.
- **Non-Public Utility Operations** – The term “non-public utility operations” means all business enterprises engaged in by JACABB Utilities, LLC that are not regulated by the Commission or otherwise subject to public utility regulation at the state or federal level.
- **Primary Purpose** – The term “primary purpose” means the acquisition, storage or maintenance of customer data by JACABB Utilities, LLC, as defined by Title 58 of the S.C. Code, which provides services pursuant to state law, federal law, or Order of the Commission.
- **Secondary Commercial Purpose** – The term “secondary commercial purpose” means any purpose that is not a primary purpose.
- **Third Party** – The term “third party” means a person who is not a customer, nor are any of the following: (a) an agent of the customer designated by the customer with JACABB Utilities, LLC to act on the customer’s behalf; (b) a regulated public utility serving the customer; or (c) a contracted agent of JACABB Utilities, LLC. For purposes of this regulation, “third party” includes any non-public utility operations or affiliate of JACABB Utilities, LLC.
- **Unique Identifier** – The term “unique identifier” means a customer’s name, account number, meter number, mailing address, telephone number, or email address.



JACABB Utilities, LLC recognizes the importance of protecting personal data that we may collect from our customers. This privacy policy applies to data collection by JACABB Utilities, LLC and applies to the use of our website. Please familiarize yourself with our privacy policy. By using our website, you accept this privacy policy.

If you have any questions, please contact JACABB Utilities, LLC at (864)973-9001 or email info@jacabbutilities.com.

Information JACABB Utilities, LLC Collects

JACABB Utilities, LLC collects information, including personal data, to provide better services to our customers. We use the term “personal data” to refer to any information that identifies or can be used to identify our customers. Common examples of personal data include: full name, driver’s license number, email address and log in name. If you desire to pay your bill via our website, we may require you to provide your financial and billing information, such as billing name and address, account number, credit/debit card number or bank account information.

How We Use the Information We Collect

- To provide you with water and wastewater services.
- To confirm identity.
- To communicate with you regarding your bills and payment obligations.
- To provide online billing and payment options.

Failure to Provide Personal Data

Your provision of personal data is required in order to use certain parts of our website. If you fail to provide certain personal data, you may not be able to access and use our online billing and payment option.

Sharing of Personal Data

JACABB Utilities, LLC shall not share, disclose, or make accessible to any third party, customers’ data. JACABB Utilities, LLC will not sell customer’s data for any purpose.

Data Protection

JACABB Utilities, LLC maintains administrative, technical and physical safeguards designed to protect the user’s personal data against accidental, unlawful or unauthorized use. We use security measures as encryption, firewalls, TLS software or HTTPS to protect personal data.



Customer Notice and Awareness

JACABB Utilities, LLC publishes its privacy policy on its website at <https://www.jacabbutilities.com>.

JACABB Utilities, LLC will provide general notice to customers of the following:

- The methods used to inform customers that personal data will be protected and not shared with or sold to any third party.
- The ways in which customers may access or modify their data.
- The contact method for questions regarding customer data.
- The security procedures in place to protect customer data.

Customer Choice and Consent

By providing JACABB Utilities, LLC with personal data when applying for water or wastewater service, JACABB Utilities, LLC assumes the individual consents to the collection and use of their personal data. Also, by using our website, the individual accepts this privacy policy.

Customers can access and maintain their personal data through JACABB Utilities, LLC online portal or by contacting (894)973-9001 or email info@jacabbutilities.com.

Customer Data Access

Please refer to above Information We Collect and How We Use section.

Data Quality and Security Procedures and Measures

Please refer to above data protection section.

Public Utility Accountability and Auditing

JACABB Utilities, LLC employees and subcontractors are given training on cybersecurity practices. JACABB Utilities, LLC takes corrective actions as needed.

Frequency of Notice to Customers

Notice is provided to customers when they apply for water and wastewater service and apply for an online account. The privacy policy is also posted on our website, <https://www.jacabbutilities.com>.

Due Diligence Exercised When Sharing Customer Data with Third Parties

JACABB Utilities, LLC does not share or sell customer data to third parties.